

STATE OF SOUTH CAROLINA

(Caption of Case)

Petition of South Carolina Electric and Gas
Company for Updates and Revisions to Schedules
Related to the Construction of a Nuclear Base Load
Generation Facility at Jenkinsville, South Carolina

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2012 - 203 - E

(Please type or print)

Submitted by: Pamela Greenlaw

SC Bar Number: N.A.

Address: 1001 Wotan Rd.
Columbia, SC 29229

Telephone: (803) 736-2977

Fax: _____

Other: _____

Email: pmlgrnlw@yahoo.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☒ Other: Request to Intervene

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- | | | | |
|--|--|--|--|
| <input checked="" type="checkbox"/> Electric | <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Electric/Gas | <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Electric/Telecommunications | <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Electric/Water | <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Electric/Water/Telecom. | <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Electric/Water/Sewer | <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Railroad | <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Sewer | <input type="checkbox"/> Complaint | <input checked="" type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Telecommunications | <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

RETURN DATE: 06/06/12
SERVICE: OK

RECEIVED

State of South Carolina
Before the Public Service Commission
Docket No. 2012-203-E

IN THE MATTER OF

Petition of South Carolina Electric and Gas Company)
for Updates and Revisions to Schedules Related to the)
Construction of a Nuclear Base Load Generation Facility) PETITION TO INTERVENE
at Jenkinsville, South Carolina)
DOCKET NO. 2012-203-E)

I, Pamela Greenlaw, as a customer of South Carolina Electric and Gas Company (SCE&G), pursuant to R. 1030865 of the Commission's rules and regulations the South Carolina Public Service Commission, do hereby petition to intervene and be made a party of record in the above-referenced docket.

In my intervention I plan to testify and present evidence insofar as possible at the hearing of SCE&G's seeking of an order from the Commission to approve updated construction schedules and capital cost estimates. I cannot at this time properly estimate the amount of such testimony and presentation I might require, as the evidence necessary to assess and build this case will require substantive investigation.

Although construction schedules and costs may need to be changed as a result of regulatory issues and of possible errors on the part of the Company's contractors and/or subcontractors which were unanticipated by SCE&G and were consequently challenged by the same, there may still have been imprudence on the part of SCE&G, particularly if SCE&G agreed to make payment for unanticipated costs. I intend to show that SCE&G should indeed have anticipated the costs and/or it should have at the least refused to pay for these costs under the non-compliance terms of its contracts with the contractors/subcontractors.

In addition, I plan to demonstrate that these "challenged costs," as SCE&G referred to them in its original but now withdrawn Docket #2012-90-E, should not and must not be rolled into rate changes at any point down the proverbial road and thus become the burden of rate payers as these are not normal, reasonable costs and are not covered by the Base Load Review Act.

Please accept this Petition to Intervene, and allow me to be made an intervenor and a party of record with the ability to fully participate in this proceeding and to have full access to documents and information necessary to build my case.

Sincerely,



Pamela Greenlaw

Customer of SCE&G

RECEIVED
PSC SC
MAIL/DMS
JUN 11 2012

1001 Wotan Road
Columbia, SC 29229
July 21, 2012

Ms. Jocelyn Boyd
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, SC 29211

RE: Petition of South Carolina Electric and Gas
Company for Updates and Revisions to Schedules
Related to the Construction of a Nuclear Base Load
Facility at Jenkinsville, South Carolina
DOCKET # 2012-203-E

Dear Ms. Boyd,

Please find enclosed my petition to intervene in the above-named Docket. By copy of this letter , I am serving all parties of record.

Sincerely,

Pamela Greenlaw

Cc:

Belton T. Zeigler
Gary Pope
K.Chad Burgess
Matthew W. Gissendanner
Jeffrey M. Nelson
Courtney Dove Edwards
Shannon Bowyer Hudson
Scott Elliott
W. Rhett Perry, Jr.
Joseph Wojcicki
Robert Guild